[SEQ CHAPTER \h \r 1]**Attachment to Tasking Assignment Record**
Site Inspection (SI)
Blades Groundwater Site
Blades, Sussex County, Pennsylvania

Background Discussion

The United States Environmental Protection Agency (EPA) in cooperation with Delaware's Department of Natural Resources and Environmental Control (DNREC) concur that further investigation and actions are required at the Procino and Peninsula Plating sites in Blades, DE ("the Site"). The Procino Plating Site (EPA ID No. DEN000306737), Delaware. The Peninsula Plating Site (EPA ID No. DE0001167998), Delaware.

Due to new information identified in a file review of Procino Plating's Preliminary Assessment (PA) report from 2010 EPA has suggested in February 2016 DNREC collect additional samples from three municipal wells. From April 2016 to January 2018 EPA and DNREC coordinated the investigation and due to the potential for perflourinated compounds (PFAS) emanating from the Procino Plating Site, DNREC collected three groundwater samples from the public wells in Blades, DE.

Additionally, contamination was previously documented emanating from the Peninsula Plating facility. Ex. 9 - Wells
The three-shallow public drinking water wells are impacted by PFOS/PFOA (PFAS) above the Health Advisory Level (HAL). The two electroplating facilities Ex. 9 - Wells
Ex. 9 - Wells have the potential to be a source of PFAS and metals contamination.

Procino Plating parcel is a 1.6 acres and has an active plating facility located in Blades, DE. The company has been active and operating plating facility since the 1980's although the extent of plating operations has been reduced to hard chrome plating for griddle tops and minor aluminum etching. The site is surrounded by residential properties to the north, south, and east. Railroad tracks are located adjacent to the site to the west and just beyond the tracks is an additional residential community.

DNREC investigated the site due to alleged improper handling of hazardous waste at the site. A Preliminary Assessment (PA) dated October 2010 was performed on the site and recommended a Site Investigation (SI) due to chemical use and potential to impact soil and groundwater. Ex. 9 - Wells The SI was performed in 2011 by DNREC in coordination with the Delaware Division of Public Health Office of Drinking Water (ODW) and included sampling any registered / permitted private water supply wells within the Town of Blades limits. Water samples from outdoor spigots of residential homes were taken at each registered, accessible private well. In 2012 a total of 12 private water supply wells were sampled Ex. 9 - Wells and in addition 13 borings and 6 monitoring wells were installed.

Results indicated that dieldrin and heptachlor epoxide were detected at levels exceeding EPA's screening levels. Chromium was detected in one well approximately 10 times the EPA MCL. Nickel was detected but was below EPA screening levels. Both iron and

manganese were detected but not considered a concern due to background levels and lack of health effects.

DNREC recommended a Remedial Investigation to further evaluate the horizontal and vertical extent of chromium and pesticides detected in monitoring wells. Only shallow ground water was evaluated during the SI. An uncommon detection of cyanide was noted in an offsite drinking water well from a depth of between 43 and 48 feet below ground surface, coupled with the fact that cyanide containing solutions are commonly used in plating operations and a polyethylene tank was noted on the property with the words "Cyanide Treatment 2" stenciled on the side, raise concern for an undetected release from the Site. Therefore in 2011, DNREC recommended further evaluation of groundwater below a depth of 20 feet. It is also recommended that additional private water supply wells be tested and analyzed for the presence of total metals and cyanide. DNREC asked EPA for federal assistance due to exceedances of the MCLs in the drinking water wells, a large geological area, and limited financial resources accessible to DNREC. The State of Delaware's DNREC-SIRS division took over the lead of this Site in 2014.

From 2011 to 2016, DNREC oversaw further assessment through the Delaware's Voluntary Cleanup Program. As such a Remedial Investigation was ongoing by the owner of the facility and therefore EPA assigned a high qualifier to this site along with a status of Other Cleanup Activity (OCA).

At present this SI will determine whether hazardous substances are present and are migrating to the surrounding environment. The purpose of this Scope of Work (SOW) is to evaluate this Site under CERCLA due to longstanding and significant continued groundwater contamination. In order to address PFAS and metals contamination DNREC concurred that it would be prudent if the EPA would address the unresolved site contamination and groundwater plume(s).

In 2016, EPA observed several small drums of Fumetrol 140 in site photographs in the Procino Plating SI report. The chemical is known to have PFAS compounds as a component. The chemical is used a "wetting agent" and a surface water stabilizer during the electroplating process. As part of an ongoing file review EPA also noted that Peninsula Plating had used the same plating processes, however, the wetting agent used is unknown at this moment. EPA will conduct SI activities to determine the potential accumulation and migration of the pollutant or contaminate and other hazardous electroplating substances off the site.

A Site Inspection (SI) will be performed which will incorporate the collection of sampling data onsite to confirm or deny recent presence of contamination at the two plating facilities and to help determine if there is a continued offsite threat to any exposure pathway. The SI data will be incorporated into a preliminary Hazard Ranking System (HRS) score which will be calculated to document if the Site has an exposure pathway that would have a score and would qualify for placement on the National Priorities List (NPL). A meeting between EPA, DNREC's Work Assignment Manager (WAM), the PRP owners, the contractors, and The State of Delaware's DHSS should be held prior to the beginning of any tasks for the Site.

Activities/Tasks

As part of a technical direction document (TDD) that will be issued by EPA Region III under the START contract, the Eastern Region START contractor (Weston) shall complete the following activities/tasks under the TDD in support of a SI:

Review site-related background information. This review shall include documentation in EPA Region III's possession and DNREC-SIRS online public site.
Procino Plating: [HYPERLINK \l "_top"]
Peninsula Plating: [HYPERLINK \l "_top"]
Blades Groundwater: [HYPERLINK \l "_top"]

Perform a one-day site reconnaissance, as necessary, no later than one (2) weeks after EPA Region III receives permission (or otherwise secures access) to enter the site/sites to gather background materials and evaluate locations of potential sources and sampling locations. The project scope and schedule will be finalized during the reconnaissance.

A sampling and analysis plan (SAP), Health and Safety Plan (HSP), and Quality Assurance Project Plan (QAPP) package will be prepared to identify and complete data gaps that would justify sampling for finalizing the investigation. The SAP shall include a level of field/analytical effort sufficient to characterize environmental conditions in a manner allowing EPA Region III to determine the extent to which future actions are warranted.

Prepare all subcontracting documentation required for a groundwater investigation with 7 new wells up to 100 feet in depth, and 12 shallow wells up to 60 feet, IDW handling and storage, and surveying of 19 new wells. Drilling activities will be conducted in the Columbia Formation – 2-inch wells will be installed and the groundwater will be sampled through primarily thin fine sands and fine gravels. Groundwater samples will be collected for PFAS, metals, cyanide, and pesticides.

Groundwater sampling will occur for 14 existing 1-inch shallow wells previously installed during Procino Plating's remedial investigation. The wells range in depth from 18-37 feet deep. Samples will be collected for PFAS, metals, cyanide, and pesticides. Prepare Routine Analytical Services (RAS) and, as necessary, Delivery Analytical Services (DAS) request forms, which shall include the appropriate number/types of field quality control samples, for WAM approval in preparation of the sampling.

Surface water and sediment samples will be collected from up to 6 locations from the Nanicoke River and its tributary. Samples will be collected for PFAS, metals, pesticides and cyanide. Prepare Routine Analytical Services (RAS) and, as necessary, Delivery Analytical Services (DAS) request forms, which shall include the appropriate number/types of field quality control samples, for WAM approval in preparation of the sampling.

Coordinate with the owner of Procino Plating for future groundwater sampling activities. Coordinate with the owner for Peninsula Plating to install new well and sample the groundwater. Coordinate with the the State of Delaware and DNREC to obtain well permits for drilling of all wells. Coordinate with private property owners, and the Town of Blades, to obtain site access.

Perform the SI no later than two (4) weeks after WAM transmission of the approved RAS and/or DAS request forms to the EPA Region III Client Team.

Field activities are anticipated to consist of investigatory drilling, groundwater, sediment and surface water sampling with the number and locations of samples determined based on guidance from the EPA Site Assessment Manager. Environmental samples collected as part of this investigation will likely be analyzed either by EPA Region III's Environmental Science Center or through EPA's Contract Laboratory Program (CLP). Unless otherwise specified, these samples will be submitted for analyses to include Perfluorinated Compounds (PFAS), Full Target Analyte List (TAL) Inorganics and Cyanide, and Pesticides using standard CLP Statements of Work ("SOWs"). The WAM, in consultation with the EPA Region III Client Team, may determine that site-specific circumstances and analyses are necessitated for specific environmental samples. EPA may determine non-standard parameters (e.g., substances not included within the TAL inorganics and/or TCL organics) or selection of reporting limits for certain substances that are more sensitive than those specified under the CLP SOW. In such instances, these samples would be analyzed by a non-CLP (private) laboratory.

The WAM will request either a 21-day turn-around-time for all laboratory analyses, or as permitted due to resource constraints. Third-party data validation will be performed in accordance with the latest version of EPA Region III's Modifications to the National Functional Guidelines for Data Review and EPA Region III's Innovative Approaches for Data Validation (for organics and inorganics). In cases where samples are not being analyzed through the CLP, the analytical laboratory will generate a CLP-equivalent deliverables package necessary to permit third-party validation. Inorganic and organic data will be validated to level IM2 and level M3, respectively. The WAM requests a standard turn-around time for validation of laboratory data, or as permitted due to resource constraints. The WAM expects to receive validated data for all samples approximately six (6-8) weeks after the date of sample collection.

The contractor will review/evaluate validated analytical data by comparison to EPA Region III's Regional Screening Levels (RSLs) and the DNREC-SIRS HSCA Reporting Level Tables and EPA's Reporting Levels/Quantitation Limit tables for the appropriate media and land uses. Provide a summary table and map to EPA (1) week after validated data is available.

Prepare a SI Report for WAM review/comment that documents all field activities and evaluation of findings. The contractor shall submit the SI Report to the WAM within four (4) weeks of receipt of all validated data.

The contractor will prepare a preliminary HRS score for WAM review/comment that will be submitted as a confidential document separate from the SI report.

Finalize the SI Report, and data summaries within two (2) weeks after receiving the WAM's comments on the draft Report.

Finalize the preliminary HRS Score within one (1) week after receiving the WAM's comments on the draft Pre-score.

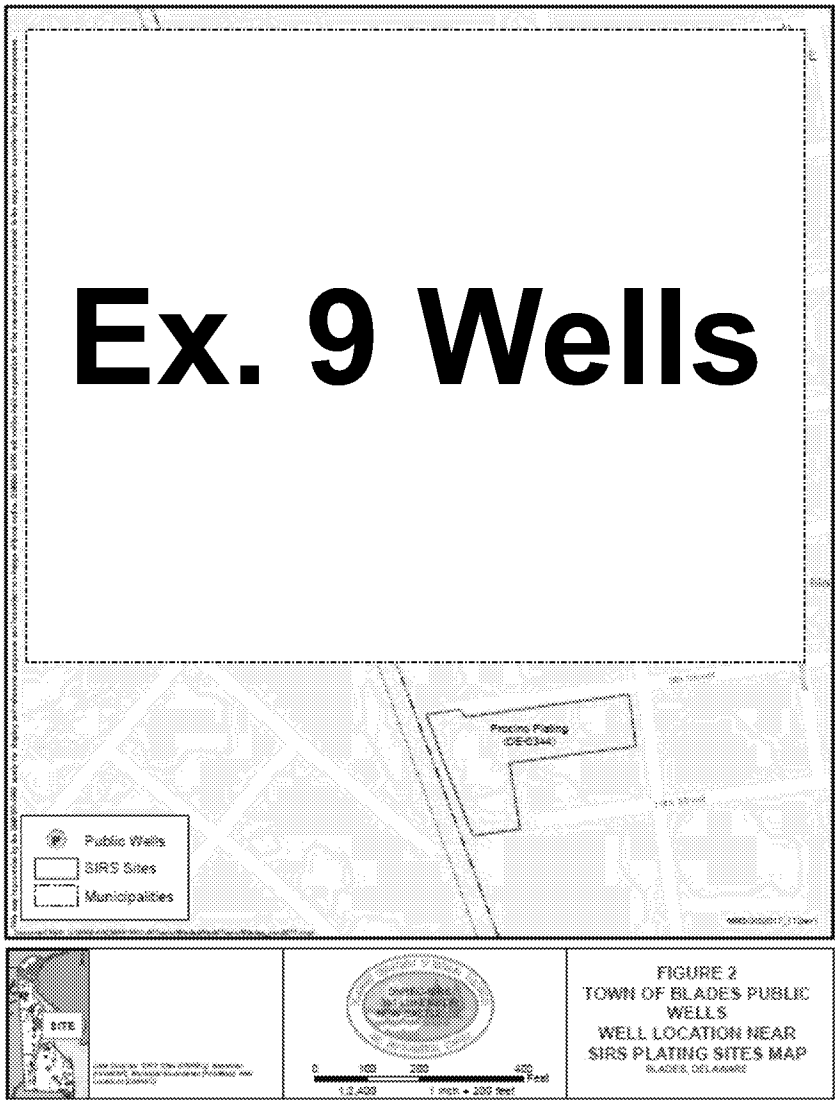
Attend meetings/conference calls as requested by the WAM.

If necessary, this TDD will be amended in the future to include additional activities tasks including additional sampling;

Estimated Project Schedule for Entire Project (subject to revision)

- Background Review - (April 9th to May 1st)
- Site Reconnaissance site planning - (During April of 2018)
- Draft SAP and preparing drilling/IDW contracts – (May 1st to 11th)
- Final SAP and Analytical Request Completed – (May 14th to May 16th, 2018)
- Sample Collection – May-June, 2018
- Draft SI Report & Draft HRS Pre-Score – (Summer, 2018)
- Final SI Report & Final HRS Pre-Score – (September 1st, 2018)

Prepared by: Connor O'Loughlin (215-814-3304) will be the WAM under this TDD
Prepared on: March 19, 2018



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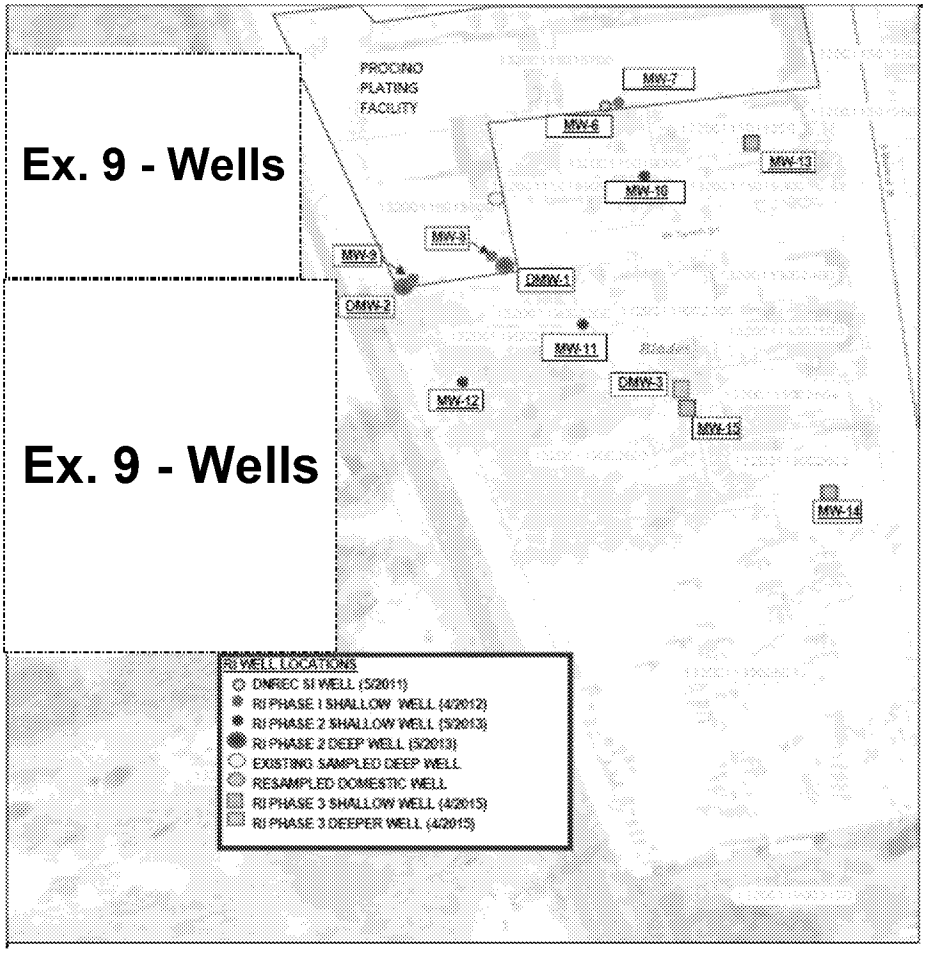
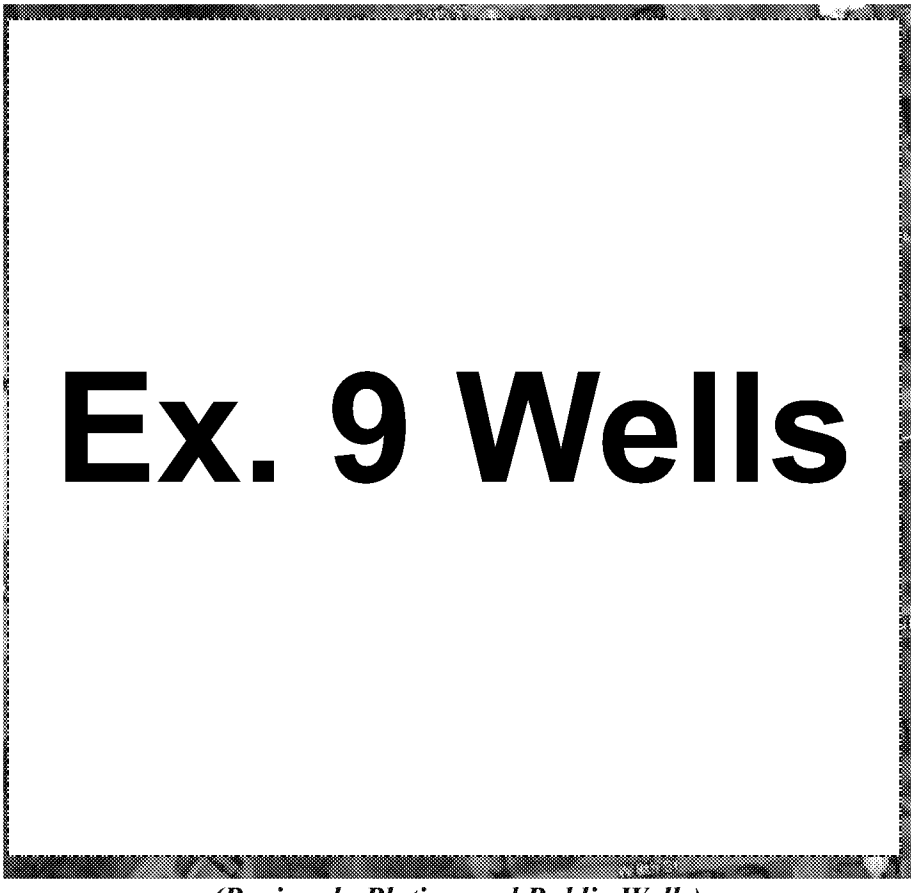
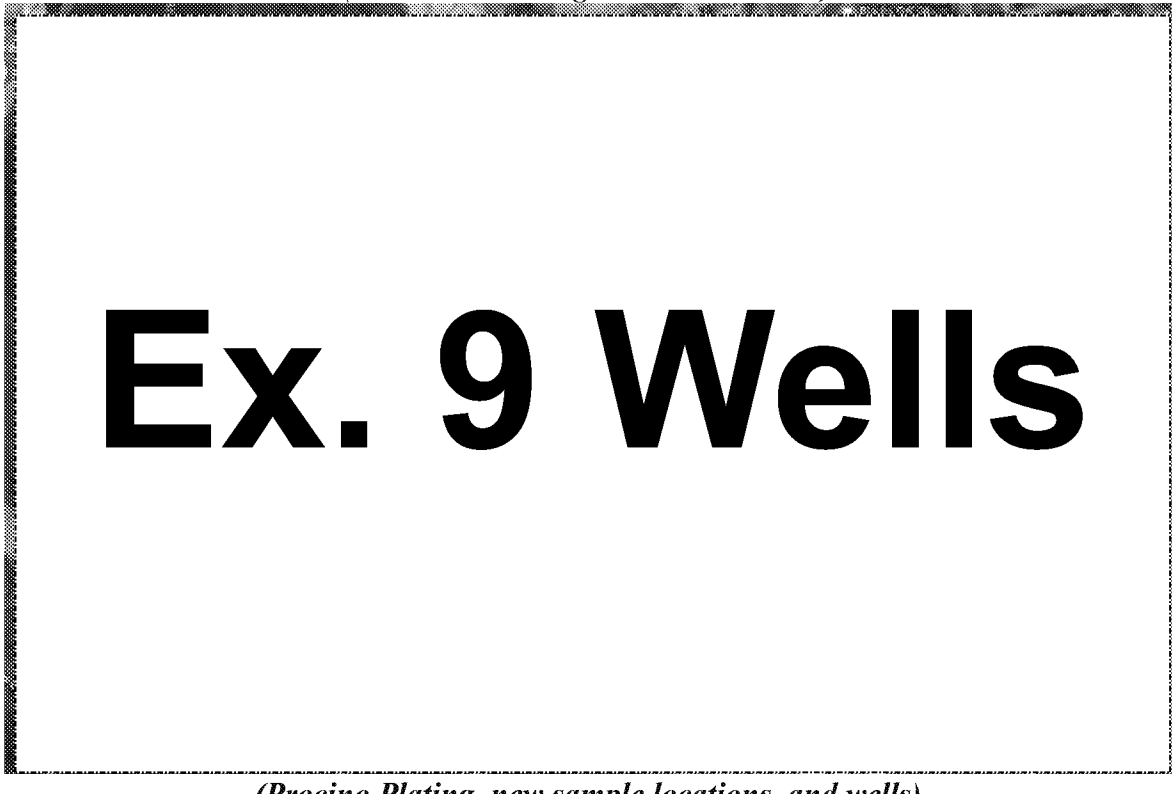

Ex. 9 - Wells
Ex. 9 - Wells
PROCINO
PLATING
FACILITY
MW-7
MW-6
MW-13
MW-10
MW-9
MW-8
OMW-1
OMW-2
MW-11
OMW-3
MW-12
MW-15
MW-14
RI WELL LOCATIONS
DNREC RI WELL (5/2011)
RI PHASE 1 SHALLOW WELL (4/2012)
RI PHASE 2 SHALLOW WELL (5/2013)
RI PHASE 2 DEEP WELL (5/2013)
EXISTING SAMPLED DEEP WELL
RESAMPLED DOMESTIC WELL
RI PHASE 3 SHALLOW WELL (4/2015)
RI PHASE 3 DEEPER WELL (4/2015)



(Peninsula Plating and Public Wells)



(Procino Plating, new sample locations, and wells)